

PATRICK H. HICKS, ESQ., Bar #4632
BRUCE C. YOUNG, ESQ., Bar #5560
ETHAN D. THOMAS, ESQ., Bar #12874
LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway, Suite 300
Las Vegas, NV 89169-5937
Telephone: 702.862.8800
Fax No.: 702.862.8811

JAMIE CHU, ESQ., Bar # 10546
LITTLER MENDELSON, P.C.
2050 Main Street, Suite 900
Irvine, CA 92614
Telephone: 949.705.3000
Fax No.: 949.724.1201

Attorneys for Defendants
CLARK COUNTY SCHOOL DISTRICT,
EDWARD GOLDMAN and ANITA WILBUR

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ELENA RODRIGUEZ-MALFAVON,

Plaintiff,

vs.

CLARK COUNTY SCHOOL DISTRICT,
EDWARD GOLDMAN and ANITA
WILBUR,

Defendants.

CASE NO. 2:12-CV-01673-APG-PAL

**[PROPOSED] STIPULATION AND
ORDER TO EXTEND TIME FOR THE
PARTIES TO FILE A JOINT PRETRIAL
ORDER**

[FIRST REQUEST]

Plaintiff, ELENA RODRIGUEZ-MALFAVON and Defendant, CLARK COUNTY SCHOOL DISTRICT¹, by and through their respective counsel of record, do hereby stipulate and agree to extend the current deadline to file a Joint Pretrial Order of January 6, 2016, by an additional 30 days, up to and including **February 5, 2016**.

The parties agree that the instant extension is necessary because the caseload of counsel for

¹ While not specifically addressed in the Court's Order, Defendants Edward Goldman and Anita Wilbur were effectively dismissed from this action by virtue of the Court's decision on Defendants' Motion for Summary Judgment. [**Doc. #50**]. As noted in that Order, the only remaining claim to be resolved at trial is Plaintiff's Title VII retaliation claim pertaining to her time in the Purchasing Department, which by law cannot be asserted against individual Defendants Goldman and Wilbur.

both parties during the month of December has not allowed them sufficient time to discuss and come to an agreement on various issues in order to complete the Pretrial Order. The instant extension is also necessary because of previously scheduled time away from the office by counsel for both parties. It is important to note that a trial date has not yet been set in this case, and as such, the trial will not need to be postponed due to the requested extension.

This is the parties' first request for an extension of this deadline and it is sought in good faith and not for the purpose of delay.

Dated: December 29, 2015

Dated: December 29, 2015

Respectfully submitted,

Respectfully submitted,

/s/ Richard Segerblom
 RICHARD SEGERBLOM, ESQ.
 Attorney for Plaintiff
 ELENA RODRIGUEZ-MALFAVON

/s/ Ethan D. Thomas
 BRUCE C. YOUNG, ESQ.
 ETHAN D. THOMAS, ESQ.
 LITTLER MENDELSON, P.C.
 Attorneys for Defendants
 CLARK COUNTY SCHOOL DISTRICT,
 EDWARD GOLDMAN and ANITA WILBUR

ORDER

IT IS SO ORDERED.

Dated: December 30, 2015.


 UNITED STATES MAGISTRATE JUDGE